



November 30, 2004

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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of Kale
Docket #FV-04-311

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to proceed with a revision to the U.S. Grade Standard for kale. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. In reviewing comments from those who responded, it became clear that several members handle kale in a variety of packing styles, and each style requires a different set of measurements. The styles include loose-packed plants, by-the-bunch plants and bunched leaves.

Loose-Packed Plants

In general, members feel it would be an improvement if kale plants shipped loose-pack would be measured by count rather than by weight.

By-the-Bunch Plants

Members also feel that kale plants that are shipped by-the-bunch should have as their unit of inspection by-the-bunch. Since bunches of kale are considered “consumer units,” this type of measurement would resemble those currently applied to spinach shipped by-the-bunch.

Bunched Leaves

Industry marketing practices commonly include shipments of bunched leaves, but the U.S. Grade Standards don’t directly apply. Each of the current grade classifications — U.S. No.1, U.S. Commercial and Unclassified — define kale on the basis of whole “plants of kale,” but none offers inspection criteria for kale shipped as bunched leaves. Therefore, it would be helpful if USDA would consider establishing inspection criteria for kale shipped as “bunched leaves.”

Our members believe that well-defined standards for kale shipped in a variety of ways will improve consistency of delivered product and enhance the relevance and effectiveness of USDA inspections.

I hope these insights are helpful. Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Davis". The signature is fluid and cursive, with the first name "Patrick" being more prominent.

Patrick A. Davis
President